

From: [Rossi, Lois](#)
To: [Laws, Meredith](#)
Subject: Re: Neonicotinoid letters from Dr. Bradbury
Date: Monday, August 19, 2013 10:45:21 AM

Good reply.

From: Laws, Meredith
Sent: Monday, August 19, 2013 10:07:53 AM
To: Jeff Jones
Cc: Rossi, Lois; 'Russ Davis'; Rate, Debra
Subject: RE: Neonicotinoid letters from Dr. Bradbury

Hi Jeff:

I'm familiar with the Arborjet products and the labeling that was sent last week does not apply to them. As you noted, the letter directed that products used as foliar applications need the new labeling. Products used as tree injections only are not subject to this labeling.

Regarding the efficacy data, if you have data that represents translocation of imidacloprid through the plant, we would want to see it. We do have your efficacy data on file for the Emerald Ash Borer and Asian Longhorned Beetle, you do not need to resubmit that. Regarding the stewardship plan, if Arborjet does not have one specific to protection of pollinators, but has a basic plan, we would like you to submit it.

Thank you for your email. Fee free to call me if you have any further questions.

Meredith

Meredith Laws
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Registration Division
Office of Pesticide Programs
(703) 308-7038
www.epa.gov/pesticides

From: Jeff Jones [mailto:jjones@delta-ac.com]
Sent: Sunday, August 18, 2013 3:16 PM
To: Laws, Meredith
Cc: Rossi, Lois; 'Russ Davis'; jjones@delta-ac.com
Subject: Neonicotinoid letters from Dr. Bradbury

Dear Ms. Laws:

My client, Arborjet, Inc., has two registered products containing imidacloprid, Ima-jet and Ima-jet

10% (EPA Reg. No.'s 74578-1 and 74578-6 respectively). As a consequence the company received two recent letters from Dr. Bradbury regarding imidacloprid products dated July 22 and August 15.

Both of the Arborjet products are for direct injection into trees only and the Directions for Use include no spray or broadcast use patterns. I note that Dr. Bradbury's most recent letter applied only to products "that have outdoor foliar use directions (except granulars)." Since this letter appears to target only those neonicotinoid products to which foraging bees are potentially exposed, I wonder whether a similar limitation was intended for the first letter of July 22, or on further consideration the Agency might decide to apply the limitation to the first letter.

The burdens associated with responding to the original letter are not trivial, and I question the value of imposing this burden on products with direct tree injection uses only.

Thanks for your consideration.

Best regards,
Jeff Jones, Agent
Arborjet, Inc.